

RM-10412 is a petition that is totally without merit. It appears to be a "solution in search of a problem". Mr. Leggett seems to be the only person who is having this kind of problem with the "field repair" of amateur radio equipment. There are several problems with his petition, including but not limited to the following:

1. Existing commercial equipment can be repaired by the user. I have repaired several of my radios in the past year. If there is a problem, it is be the lack of availability of repair parts, or affordable repair parts. Even common components such as transistors, resistors, capacitors, inductors and IC's are almost impossible to get. Even giving RM-10412 the benefit of a generous reading, it addresses the wrong problem. The problem is not that the radio manufacturers are making the wrong equipment, it's that the parts producers are not making the parts available. A petition that required every town of over ten thousand population to have a wholesale electronics shop that carried all the available parts would have met the stated requirements much more elegantly.
2. Even with the difficulty in obtaining parts, several kit manufacturers exist who make it possible for the Amateur Radio operator to construct their own equipment. In the past two years I have built several of these kits and have been very pleased with the results. Even without any regulatory changes, radios built from kits produced by Elecraft, Small Wonder Labs, TenTec and others already meet the proposed requirements. This in itself is a demonstration that RM-10412 is attempting to solve a problem that doesn't exist. Manufacturers are already producing radios that would fit the proposed regulatory handcuffs and they are not being overrun by demand.
3. The proposed regulation would not serve to "advance the radio art" since it would impose arbitrary design constraints on technology. Many of the low cost low power (QRP) radios produced today would not be practical if the design had to be modified to include the extra components described by RM-10412. They would have to be bigger, require more power to operate, be more difficult to operate, and in a delicious twist of irony would therefore be less reliable than the current simpler design. Development and exploration of new radio designs, technology and techniques would be inhibited by a measure that claims to enhance "field repair".
4. The term "field repair" is too nebulous. Does it mean that the radio can be repaired "in the field", using a pair of pliers and some odd bits of copper wire? Does it mean that a moderately equipped amateur radio operator can troubleshoot and perform basic repairs such as swapping a chip, changing an internal battery or resetting the processor?
5. The FCC does not need to involve itself in the details of how the manufacturers design the equipment. Regulations that cover items such as spurious radiation, harmonic levels, and similar operational items are vital to the disciplined use of the radio frequency spectrum. Regulation that says that a radio must consist of components that meet some arbitrary design criteria that are not based on operation but only on aesthetics is not needed.

Given these factors I ask that you dismiss RM-10412 as unneeded and

unwanted by the Amateur Radio community.